

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA – (ALEXANDRIA)

Volkswagen AG, et al.,

Plaintiffs,

v.

Syed Iqbal, et al.,

Defendants.

NO. 1:17-cv-970-LMB-IDD

DEFENDANT BEN SUIDMAN'S  
ANSWER TO COMPLAINT

Defendant Ben Suidman answers Plaintiffs' complaint as follows:

1. Defendant Suidman denies the allegations in paragraph 1 of Plaintiffs' complaint.
2. The allegations in paragraph 2 of Plaintiffs' complaint are legal in nature, and

therefore Defendant Suidman denies them.

3. Defendant Suidman denies the allegations in paragraph 3 of Plaintiffs' complaint.
4. Defendant Suidman denies the allegations in paragraph 4 of Plaintiffs' complaint.
5. Defendant Suidman denies the allegation in paragraph 5 of Plaintiffs' complaint.
6. The allegations in paragraph 6 of Plaintiffs' complaint are legal in nature, and

therefore Defendant Suidman denies them.

7. Defendant Suidman lacks information and/or belief regarding the allegations in paragraph 7 of Plaintiffs' complaint and therefore he denies them.

8. Defendant Suidman lacks information and/or belief regarding the allegations in paragraph 8 of Plaintiffs' complaint and therefore he denies them.

9. Defendant Suidman lacks information and/or belief regarding the allegations in paragraph 9 of Plaintiffs' complaint and therefore he denies them.

10. Defendant Suidman lacks information and/or belief regarding the allegations in paragraph 10 of Plaintiffs' complaint and therefore he denies them.

11. Defendant Suidman admits that Volkswagen and Audi are well known automobile manufacturers. Defendant Suidman denies the remaining allegations in paragraph 12 of Plaintiffs' complaint.

12. Defendant Suidman lacks information and/or belief regarding the allegations in paragraph 12 of Plaintiffs' complaint and therefore he denies them.

13. Defendant Suidman lacks information and/or belief regarding the allegations in paragraph 13 of Plaintiffs' complaint and therefore he denies them.

14. Defendant Suidman lacks information and/or belief regarding the allegations in paragraph 14 of Plaintiffs' complaint and therefore he denies them.

15. Defendant Suidman lacks information and/or belief regarding the allegations in paragraph 15 of Plaintiffs' complaint and therefore he denies them.

16. Defendant Suidman lacks information and/or belief regarding the allegations in paragraph 16 of Plaintiffs' complaint and therefore he denies them.

17. Defendant Suidman lacks information and/or belief regarding the allegations in paragraph 17 of Plaintiffs' complaint and therefore he denies them.

18. Defendant Suidman lacks information and/or belief regarding the allegations in paragraph 18 of Plaintiffs' complaint and therefore he denies them.

19. Defendant Suidman lacks information and/or belief regarding the allegations in paragraph 19. of Plaintiffs' complaint and therefore he denies them.

20. Defendant Suidman lacks information and/or belief regarding the allegations in paragraph 20 of Plaintiffs' complaint and therefore he denies them.

21. Defendant Suidman lacks information and/or belief regarding the allegations in paragraph 21 of Plaintiffs' complaint and therefore he denies them.

22. Defendant Suidman lacks information and/or belief regarding the allegations in paragraph 22 of Plaintiffs' complaint and therefore he denies them.

23. Defendant Suidman lacks information and/or belief regarding the allegations in paragraph 23 of Plaintiffs' complaint and therefore he denies them.

24. Defendant Suidman lacks information and/or belief regarding the allegations in paragraph 24 of Plaintiffs' complaint and therefore he denies them.

25. Defendant Suidman denies the allegation in paragraph 25 of Plaintiffs' complaint.

26. Defendant Suidman lacks information and/or belief regarding the allegations in paragraph 26 of Plaintiffs' complaint and therefore he denies them.

27. Defendant Suidman lacks information and/or belief regarding the allegations in paragraph 27 of Plaintiffs' complaint and therefore he denies them.

28. Defendant Suidman lacks information and/or belief regarding the allegations in paragraph 28 of Plaintiffs' complaint and therefore he denies them.

29. Defendant Suidman lacks information and/or belief regarding the allegations in paragraph 29 of Plaintiffs' complaint and therefore he denies them.

30. Defendant Suidman lacks information and/or belief regarding the allegations in paragraph 30 of Plaintiffs' complaint and therefore he denies them.

31. Defendant Suidman lacks information and/or belief regarding the allegations in paragraph 31 of Plaintiffs' complaint and therefore he denies them.

32. Defendant Suidman lacks information and/or belief regarding the allegations in paragraph 32 of Plaintiffs' complaint and therefore he denies them.

33. Defendant Suidman lacks information and/or belief regarding the allegations in paragraph 33 of Plaintiffs' complaint and therefore he denies them.

34. Defendant Suidman lacks information and/or belief regarding the allegations in paragraph 34 of Plaintiffs' complaint and therefore he denies them.

35. Defendant Suidman lacks information and/or belief regarding the allegations in paragraph 35 of Plaintiffs' complaint and therefore he denies them.

36. Defendant Suidman lacks information and/or belief regarding the allegations in paragraph 36 of Plaintiffs' complaint and therefore he denies them.

37. Defendant Suidman lacks information and/or belief regarding the allegations in paragraph 37 of Plaintiffs' complaint and therefore he denies them.

38. Defendant Suidman lacks information and/or belief regarding the allegations in paragraph 38 of Plaintiffs' complaint and therefore he denies them.

39. Defendant Suidman denies the allegation in paragraph 39 of Plaintiffs' complaint.

40. Defendant Suidman lacks information and/or belief regarding the allegations in paragraph 40 of Plaintiffs' complaint and therefore he denies them.

41. Defendant Suidman lacks information and/or belief regarding the allegations in paragraph 41 of Plaintiffs' complaint and therefore he denies them.

42. Defendant Suidman denies the allegation in paragraph 42 of Plaintiffs' complaint.

43. Defendant Suidman denies the allegation in paragraph 43 of Plaintiffs' complaint.

44. Defendant Suidman denies the allegation in paragraph 44 of Plaintiffs' complaint.

45. Defendant Suidman denies the allegation in paragraph 45 of Plaintiffs' complaint.

46. Defendant Suidman denies the allegation in paragraph 46 of Plaintiffs' complaint.

47. Defendant Suidman denies the allegation in paragraph 47 of Plaintiffs' complaint.

48. Defendant Suidman denies the allegation in paragraph 48 of Plaintiffs' complaint.

49. Defendant Suidman denies the allegation in paragraph 49 of Plaintiffs' complaint.

50. Defendant Suidman denies the allegation in paragraph 50 of Plaintiffs' complaint.

51. Defendant Suidman denies the allegation in paragraph 51 of Plaintiffs' complaint.  
52. Defendant Suidman denies the allegation in paragraph 52 of Plaintiffs' complaint.  
53. Defendant Suidman denies the allegation in paragraph 53 of Plaintiffs' complaint.  
54. Defendant Suiman hereby re-alleges and incorporates by reference the admissions and denial set forth in paragraphs 1 through 53 above.

55. Defendant Suidman denies the allegation in paragraph 55 of Plaintiffs' complaint.  
56. Defendant Suidman denies the allegation in paragraph 56 of Plaintiffs' complaint.  
57. Defendant Suidman denies the allegation in paragraph 57 of Plaintiffs' complaint.  
58. Defendant Suidman denies the allegation in paragraph 58 of Plaintiffs' complaint.  
59. Defendant Suidman denies the allegation in paragraph 59 of Plaintiffs' complaint.  
60. Defendant Suidman denies the allegation in paragraph 60 of Plaintiffs' complaint.  
61. Defendant Suiman hereby re-alleges and incorporates by reference the admissions and denial set forth in paragraphs 1 through 60 above.

62. Defendant Suidman denies the allegation in paragraph 62 of Plaintiffs' complaint.

63. Defendant Suidman denies the allegation in paragraph 63 of Plaintiffs' complaint.  
64. Defendant Suidman denies the allegation in paragraph 64 of Plaintiffs' complaint.  
65. Defendant Suidman denies the allegation in paragraph 65 of Plaintiffs' complaint.  
66. Defendant Suiman hereby re-alleges and incorporates by reference the admissions and denial set forth in paragraphs 1 through 65 above.

67. Defendant Suidman denies the allegation in paragraph 67 of Plaintiffs' complaint.  
68. Defendant Suidman denies the allegation in paragraph 68 of Plaintiffs' complaint.  
69. Defendant Suidman denies the allegation in paragraph 69 of Plaintiffs' complaint.  
70. Defendant Suidman denies the allegation in paragraph 70 of Plaintiffs' complaint.  
71. Defendant Suidman denies the allegation in paragraph 71 of Plaintiffs' complaint.  
72. Defendant Suidman denies the allegation in paragraph 72 of Plaintiffs' complaint.

73. Defendant Suidman denies the allegation in paragraph 73 of Plaintiffs' complaint.
74. Defendant Suidman denies the allegation in paragraph 74 of Plaintiffs' complaint.
75. Defendant Suidman denies the allegation in paragraph 75 of Plaintiffs' complaint.

**Affirmative Defenses**

1. Defendant Suidman had nothing to do with any of the acts alleged above. Had Plaintiffs performed their due diligence, they would have realized that Defendant Suidman's liability was stolen and that he was not involved in any of these matters. Defendant Suidman is entitled to an award of CR 11 Sanctions for his attorney's fees and costs incurred in being forced to defend this action.

2. Defendant Suidman respectfully reserves his right to assert additional affirmative defenses as they are discovered during the course of litigation.

**Prayer for Relief**

Defendant Suidman requests entry of judgment against Plaintiffs as follows;

1. A dismissal with prejudice of all claims and causes of action asserted against Defendant Suidman in this action;

2. An award of attorney's fees and costs incurred by Defendant Suidman in defending against this action;

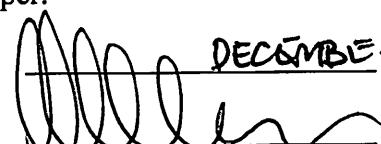
3. A judgment in favor of Defendant Suidman to include post judgment interest at the statutory rate; and

4. All other relief the Court deems just and proper.

Date of Signing:

DECEMBER 04, 2017

Signature:



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